

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS S. MANFRE.

Plaintiff,

 \mathbf{y}_i

**JEROME MAY, WILLIAM MAY,
DAVID MAY, and R&M FREIGHT,
INC.,**

Defendants.

Case No. 08 C 1281

Judge Matthew F. Kennelly

R&M FREIGHT, INC.,

Magistrate Judge Michael T. Mason

Defendant/Counter-Plaintiff,

 \mathbf{V}_i

THOMAS S. MANFRE.

Plaintiff/Counter-Defendant.

**PLAINTIFF’S AGREED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS’ ANSWERS AND COUNTERCLAIMS**

Plaintiff Thomas S. Manfre, by his undersigned attorneys, respectfully requests that the Court enter an order granting him until May 2, 2008 to respond to the Answers filed by Defendants Jerome May, William May, David May, and R&M Freight Inc. (collectively “Defendants”) and the Counterclaims filed by Counter-Plaintiff R&M Frieght Inc. In support of this Motion, Mr. Manfre states as follows:

1. Mr. Manfre filed his Complaint in this matter on March 3, 2008. After obtaining an agreed upon 14-day extension within which to respond to the Complaint, the Defendants filed their Answers and Counterclaims on April 7, 2008.

2. Under the Federal Rules of Civil Procedure, Mr. Manfre's response to those filings would be due on April 28, 2008.

3. Counsel for Mr. Manfre has been working on responding to those filings since they were filed. Despite diligent efforts, these responses will not likely be completed by April 28, 2008.

4. Accordingly, counsel for Mr. Manfre has conferred with counsel for the Defendants and counsel for all parties have agreed to allow Mr. Manfre until May 2, 2008 to file his responses.

5. This request for additional time is made for good cause shown and in the interests of substantial justice and fairness, and is not made for purposes of undue delay or harassment.

WHEREFORE, for the foregoing reasons, Plaintiff Thomas S. Manfre respectfully request that this Court enter an order enlarging the time for him to respond to the Answers and Counterclaims filed by the Defendants up to and including May 2, 2008 and for such further and additional relief as this Court deems just and proper.

Dated: April 24, 2008

Respectfully submitted,

THOMAS S. MANFRE

By: s/ Max A. Stein
One of His Attorneys

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CERTIFICATE OF SERVICE

I, Max A. Stein, state that on April 24, 2008, I electronically filed the foregoing **PLAINTIFF'S AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' ANSWERS AND COUNTERCLAIMS** with the Clerk of the Court using the ECF system which will send notification to all parties.

s/ Max A. Stein

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